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## **U.S. Department of Justice**

United States Attorney Eastern District of New York

AA

F. #2014R00150/OCDETF #NY-NYE-653

271 Cadman Plaza East Brooklyn, New York 11201

December 7, 2022

## By ECF

The Honorable Brian M. Cogan United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Martin Leonel Perez Castro

Criminal Docket No. 14-465 (BMC)

Dear Judge Cogan:

The government writes to respectfully request that the Court enter an order of excludable delay under the Speedy Trial Act between today and the next status conference in this case. At the status conference before Judge Dearie on December 7, 2022, the Court did not exclude time because counsel for the defendant was not present. The government submits that the exclusion is appropriate to permit the parties to engage in plea negotiations. Counsel for the defendant consents to this request.

Respectfully submitted,

BREON PEACE United States Attorney

By: /s/ Adam Amir

Adam Amir Andrew D. Wang Assistant U.S. Attorneys (718) 254-6311 / 6116

cc: Clerk of Court (BMC) (ECF)
Defense Counsel (by email)